

September 30, 2010

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PA P.U.C.
SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Petition of PPL Electric Utilities Corporation for
Approval of Time of Use Supplement No. 94 to Tariff
Electric PA PUC, No 201, Docket No. R-2010-

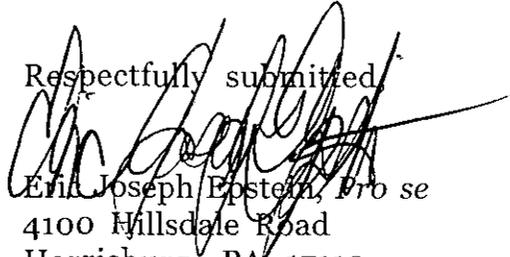
Petition to Intervene of
Eric Joseph Epstein, *Pro se*

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") is an original and three (3) copies of Eric Joseph Epstein's ("Mr. Epstein" or "Epstein") Petition to Intervene in the Above-Referenced Proceeding. This Petition has been filed Pursuant to Commission Regulations, 52 Pennsylvania Code § Sections 5.71-5.74.

As shown by the attached Certificate of Service, all parties to this proceeding have been served via the United States Postal Service and electronic communication.

Respectfully submitted,



Eric Joseph Epstein, *Pro se*
4100 Hillsdale Road
Harrisburg, PA 17112
(717)-541-1101 Phone

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY
COMMISSION**

Re: Petition of PPL Electric Utilities Corporation for
Approval of Time of Use Supplement No. 94 to Tariff
Electric PA PUC, No 201, Docket No. R-2010-

Petition to Intervene of
Eric Joseph Epstein, *Pro se*

I. Background.

1) This Proceeding involves PPL Electric Utilities Corporation's ("PPL" or "the Company") filing at the Public Utility Commission's ("Commission") for Approval of Time of Use Supplement No. 94 to Tariff Electric PA PUC, No 201, Docket No. R-2010.

2) Eric Joseph Epstein ("Epstein" or "Mr. Epstein") is a residential rate payer and resides at:

4100 Hillsdale Road
Harrisburg, PA 17112

II. Procedural Background

3) On September 23, 2010, PPL Electric Utilities Corporation filed a Petition for Approval of Time of Use Supplement No. 94 to Tariff Electric PA PUC, No 201, Docket No. R-2010 with an issue date of September 23, 2010 and an effective date of January 1, 2011.

III. Mr. Epstein's Interest in this Proceeding

4) Mr. Epstein has been a residential customer of PPL for over 25 years, and has testified or litigated consumer education, universal service, and reliability and service issues since 1985.

5) Mr. Epstein participated in PPL Electric Utilities Corporation's Request for Approval of a Competitive Bridge Plan Docket No. RP-0006227.

6) Mr. Epstein was an active participant in PPL's Collaborative stake holder process.

7) Eric Joseph Epstein participated in PPL Electric Utilities Corporation 2006 and 2007 Competitive Transition Charge Reconciliation Filings.

8) Eric Joseph Epstein was (and is) an Active Party in PPL Electric Utilities 2004, 2007 and 2010 applications with the Pennsylvania Public Utility Commission for an annual increase for distribution rates.

9) Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of A Rate Stabilization Plan.

10) Mr. Epstein was an active participant in PPL's Collaborative process with stake holders.

11) Epstein also intervened and was an Active Party in PPL Electric Utilities Request for Approval to Offer Customers a Voluntary Alternative Energy Program and to Bank Alternative Energy Credits.

12) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of a Default Service Program and Procurement Plan for the Period January 1, 2011 through May 14, 2014.

13) Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of an Energy Efficiency and Conservation Plan.

14) Also, Mr. Epstein intervened and was an Active Party in PPL Electric Utilities Corporation's Request for Approval of Time of Use Supplement No. 71 Tariff Electric PA PUC. No 201 Issued on July 31, 2009, Effective for Service On and After January 1, 2010.

IV. Petition to Intervene

15) Mr. Epstein is a residential customer of PPL Electric Utilities Corporation.

16) Eric Joseph Epstein is presently analyzing PPL's assumptions, estimates, projections, methodologies, statements, citations, predictions, and conclusions associated with the Company's Filing.

17) Mr. Epstein's initial evaluation of PPL's TOU plan found numerous errors, inconsistencies, miscalculations, unproven assumptions and unsubstantiated statements in the the following areas; including, but not limited to:

- Program design;
- Customer participation levels;
- Quantifiable energy savings;
- Oversight and implementation of existing programs;
- Time zones;
- Pricing points and pricing differentials;
- Real-time pricing;
- Compatibility and alignment with LMP pricing;
- Viability of TOU program;
- Untested and unproven methodologies; and,
- Absence of Best Management Practices, Lessons Learned or stakeholder input.

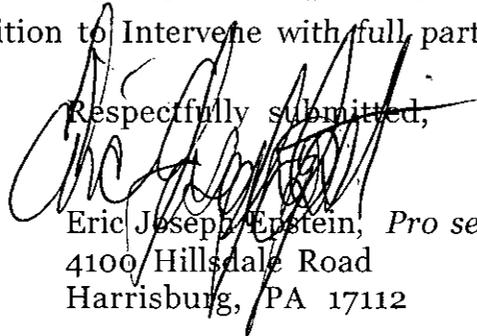
18) Mr. Epstein reserves the right to raise any issues or questions relating to any discrepancies or errors in the Above-Referenced proceeding.

V. Conclusion

19) Eric Joseph Epstein satisfies the standards for intervention under Section 5.72 of the Commission's regulations.

WHEREFORE, Eric Joseph Epstein respectfully requests that the Commission grant this Petition to Intervene with full party status.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric Joseph Epstein", is written over the typed name and address below.

Eric Joseph Epstein, *Pro se*
4100 Hillsdale Road
Harrisburg, PA 17112

CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the active participants named below by US mail or hand delivery or electronic transmission in accordance with the requirements of Section 1.54.

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Harrisburg, Pa 17111

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PPL Electric Utilities Corporation
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17 N. Second Street
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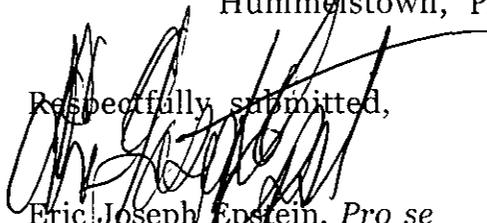
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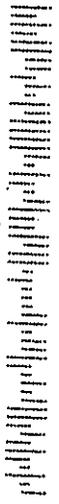
Respectfully submitted,



Eric Joseph Epstein, *Pro se*
4100 Hillside Road
Harrisburg, PA 17112

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Harrisburg, PA 17112



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Pennsylvania Public Utility Commission
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